

## REMARKS

No amendment of the claims or the specification has been made with this response. Accordingly, claims 1-25 are currently pending in the application, of which claims 1 and 21 are independent claims. In view of the following Remarks, Applicant respectfully requests reconsideration and timely withdrawal of the pending rejections for the reasons discussed below.

### ***Drawings***

Applicant notes the Office Action's notation of the objections to the drawings by the drafts person in form PTO-948. As previously noted in the prosecution of this application, Applicant never received the Office Action of January 22, 2004, and thus never received form PTO-948. In view of these circumstances, Applicant respectfully requests that the form PTO-948 be resent, so that Applicant may correct the drawings as required.

### ***Rejections Under 35 U.S.C. §102(b)***

Claims 1-4, 6-8, 15, 20-22 and 24-25 stand rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,450,562 to Rosenberg *et al.* (Rosenberg). Applicant respectfully traverses this rejection for at least the following reasons.

Among other things, claim 1 recites "dividing select pixels in the image into a plurality of slices, the slices including pixels positioned adjacent to each one another." However, Rosenberg fails to disclose this element of the claims.

Rosenberg is directed to cache-based data compression and decompression. To achieve this, the system of Rosenberg looks at the data byte based on the time when the data byte was last used. More specifically, with reference to Figure 5, cache 90 is organized in a layered manner,

“wherein topmost layer 91 is the most recently used data byte and the layers 92-92 comprise a ‘single’ layer that includes the three least recently used data bytes.” Col. 5, lines 24-27. Based on the comparison of a byte value with the contents of the cache 90, the cache contents are changed. Thus, there is no description of slicing the pixels of an image. Further, there is no disclosure that the data bytes, which the Office Action alleges correspond to an image slice, include two or more pixels positioned adjacent to each other. Rosenberg is silent on the content of the data bytes and the relative position of information in the data bytes. Rather, Rosenberg only describes the data bytes as grouped based on the last time the information was used, and not based on their position relative to one another.

Finally, the remaining elements of claim 1 clearly are also not found in Rosenberg. As discussed above, Rosenberg does not describe “dividing select pixels into a plurality of image slices.” The remaining elements of claim 1 recite various manipulations of the image slices, such as representing each slice and comparing each slice. Therefore, because Rosenberg does not describe the image slices, it necessarily cannot manipulate the image slices as recited in claim 1. The additional art cited in the Office Action fails to remedy the deficiencies of Rosenberg.

Therefore, for at least these reasons, claim 1, and the claims that depend therefrom, are allowable over the prior art of record. Applicant respectfully requests that the rejection of claim 1 and the claims that depend therefrom be withdrawn, and the claims passed to issue.

Claim 21 is a system claim that closely mirrors claim 1. Specifically, claim 21 recites, among other things, a “means for dividing select pixels in the image into a plurality of slices, the slices including pixels positioned adjacent to each one another.” Therefore, for at least the same

reasons as set forth above with respect to claim 1, claim 21, and the claims that depend therefrom, are allowable over the prior art of record. Applicant respectfully requests that the rejection of claim 21 and the claims that depend therefrom be withdrawn, and the claims passed to issue.

***Allowable Subject Matter***

Applicant thanks the Examiner for the indication that claims 9-14 and 16-19 are objected to as having allowable subject matter but being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claim.

-- 5 --

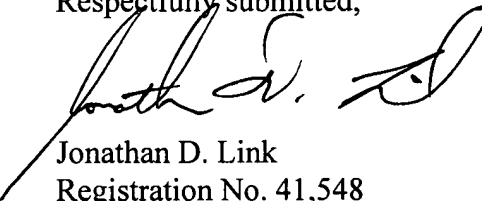
### CONCLUSION

Applicant believes that a full and complete response has been made to the pending Office Action and respectfully submits that all of the stated objections and grounds for rejection have been overcome or rendered moot. Accordingly, Applicant respectfully submits that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact the Applicants' undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,



Jonathan D. Link  
Registration No. 41,548

June 3, 2005

McGuireWoods LLP  
1750 Tysons Boulevard, Suite 1800  
McLean, Virginia 22102-4215  
Telephone No: (703) 712-5116  
Facsimile No: (703) 712-5279